

New York State Department of Environmental Conservation

Permit Review Report

Permit ID: 7-3558-00001/00027 Modification Number: 1



02/27/2006

Facility Identification Data

Name: INTERFACE SOLUTIONS INC
Address: 2885 ST RTE 481
FULTON, NY 13069

Owner/Firm

Name: INTERFACE SOLUTIONS INC
Address: 216 WOHLSEN WAY
LANCASTER, PA 17604, USA
Owner Classification: Corporation/Partnership

Permit Contacts

Division of Environmental Permits:
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Address: 615 ERIE BLVD WEST
SYRACUSE, NY 13204-2400

Division of Air Resources:
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Air Permitting Contact:
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2285 ST RTE 481
FULTON, NY 13069
Phone:3155928115

Permit Description

Introduction

The Title V operating air permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes, that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose for this permit review report is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This report will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this permit review report, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

Summary Description of Proposed Project

The purpose of this modification is to cap facility-wide HAP emissions below the major source thresholds of 10 tons per year for any individual HAP and 25 tons per year of total HAPs. In addition, this modification will incorporate the paper machine vacuum pumps and wastewater treatment plant into the

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existing permit.

Attainment Status

INTERFACE SOLUTIONS INC is located in the town of VOLNEY in the county of OSWEGO. The attainment status for this location is provided below. (Areas classified as attainment are those that meet all ambient air quality standards for a designated criteria air pollutant.)

Criteria Pollutant	Attainment Status
Particulate Matter (PM)	ATTAINMENT
Particulate Matter < 10µ in diameter (PM10)	ATTAINMENT
Sulfur Dioxide (SO2)	ATTAINMENT
Ozone* ATTAINMENT)	TRANSPORT REGION (NON-ATTAINMENT)
Oxides of Nitrogen (NOx)**	ATTAINMENT
Carbon Monoxide (CO)	ATTAINMENT

* Ozone is regulated in terms of the emissions of volatile organic compounds (VOC) and/or oxides of nitrogen (NOx) which are ozone precursors.

** NOx has a separate ambient air quality standard in addition to being an ozone precursor

Facility Description

Interface Solutions, Inc. manufactures a variety of flooring felts and gasket materials which are produced on two fourdrinier machines. Significant air emission sources at the facility include: two boilers, two paper machines, and one in-line coater and dryer. Also a wastewater treatment plant and various 6 NYCRR part 201 exempt operations are present at the facility.

Permit Structure and Description of Operations

The Title V permit for INTERFACE SOLUTIONS INC is structured in terms of the following hierarchy: facility, emission unit, emission point, emission source and process.

A facility is defined as all emission sources located at one or more adjacent or contiguous properties owned or operated by the same person or persons under common control. The facility is subdivided into one or more emission units (EU). Emission units are defined as any part or activity of a stationary facility that emits or has the potential to emit any federal or state regulated air pollutant. An emission unit is represented as a grouping of processes (defined as any activity involving one or more emission sources (ES) that emits or has the potential to emit any federal or

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state regulated air pollutant). An emission source is defined as any apparatus, contrivance or machine capable of causing emissions of any air contaminant to the outdoor atmosphere, including any appurtenant exhaust system or air cleaning device.

[NOTE: Indirect sources of air contamination as defined in 6 NYCRR Part 203 (i.e. parking lots) are excluded from this definition]. The applicant is required to identify the principal piece of equipment (i.e., emission source) that directly results in or controls the emission of federal or state regulated air pollutants from an activity (i.e., process). Emission sources are categorized by the following types:

- combustion - devices which burn fuel to generate heat, steam or power
- incinerator - devices which burn waste material for disposal
- control - emission control devices
- process - any device or contrivance which may emit air contaminants that is not included in the above categories.

INTERFACE SOLUTIONS INC is defined by the following emission unit(s):

Emission unit 1PAPER - This emission unit consists of two (2) fourdrinier machines where flooring felts and gasket material (paper) is produced.

Emission unit 1PAPER is associated with the following emission points (EP):
00021, 00033, 00034, 00035, 00037, 00038, 00039, 00040, 00046

It is further defined by the following process(es):

Process: 006 is located at FLOOR 2, Building 1 - Process 006 consists of an in-line coater and infrared radiant drying system where various coating materials are applied to the flooring felts produced on the No. 1 paper machine. The in-line coater is exhausted through the following emission points:

EP 00046 - in-line coater;

EP 00047 - infrared gas-fired radiant heater.

Process: 007 is located at FLOOR 2, Building 37 - Process 007 consists of a paper trimmer where the gasket material produced on the No. 3 paper machine is edge trimmed to specification. The trim blower emissions are exhausted through EP 00021 [TBLOW > CYCLA > FABFA].

Process: PM1 is located at FLOOR 2, Building 3 - Process PM1 consists of the No. 1 paper machine where flooring felt materials are manufactured on a fourdrinier machine. The No. 1 paper machine is exhausted through the following emission points: EP 00033 - wet end economizer; EP 00034 - dry end economizer ; EP 00035 - backwet applicator.

Process: PM3 is located at FLOOR 2, Building 37 - Process PM3 consists of the No. 3 paper machine where gasket materials are manufactured on a fourdrinier machine. The No. 3 paper machine is exhausted through the following emission points: EP 00037 - wet end exhaust; EP 00038 - middle section of dryers; EP 00039 - dry end exhaust; EP 00040 - calendar exhaust.

Emission unit 1VPUMP - This emission unit consists of multiple vacuum pumps, servicing both paper machines No. 1 and 3.

Emission unit 1VPUMP is associated with the following emission points (EP):
00238, 00240, 00258, 00266, 00269, 00278

It is further defined by the following process(es):

Process: L01 is located at Building 3 - This process consists of 8 vacuum pumps servicing paper machine No. 1. Two pumps exhaust to emission point EP00238, two to EP00240, one to EP00258, two

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to EP00269, and one to EP00278.

Process: L03 is located at Building 3 - This process consists of 8 vacuum pumps servicing paper machine No. 3. One pump exhausts to emission point EP00240, one to EP000258, and six to EP00266.

Emission unit 1WWTMP - This emission unit is the facility's wastewater treatment plant consisting of 2 lagoons, 2 aeration basins, and 2 dissolved air flotation (DAF) tanks. The emission levels from these activities are considered insignificant, however HAP emissions will be recorded in order to demonstrate compliance with the proposed HAP caps.

It is further defined by the following process(es):

Process: WW1 is located at Building 63 - This process consists of 2 clarifiers, 2 flotation tanks (DAF), and 2 aeration basins. The emission levels from these activities are considered insignificant. HAP emissions will be recorded to demonstrate compliance with the proposed HAP caps.

Emission unit 1PULPR - This emission unit consists of six (6) pulping stations. Raw materials (in bulk form) are mixed with hot water and agitated.

Emission unit 1PULPR is associated with the following emission points (EP):

00005, 00006, 00007, 00020, 00030, 00031

It is further defined by the following process(es):

Process: 001 is located at FLOOR 1, Building 21 - Process 001 consists of pulping/mixing operations where earth fillers (in bulk form), pulps (in sheet form), wood pulp, recycled newsprint, sodium carbonate, and cellulose wood pulp are added to hot water and agitated. Particulate emissions are controlled by wet scrubbers. The pulpers are exhausted through the following emission points. EP00006 - No. 2 pulper [PULP2 > SCRB2], EP00020 - No. 4 pulper [PULP 4 > SCRB4], EP0031 - sodium carbonate mix tank [SCARB > SCRUB].

Process: 004 is located at FLOOR 1, Building 21 - Process 004 consists of pulping/mixing operations where earth fillers (in bulk form), pulps (in sheet form), and pulp, recycled newsprint, sodium carbonate, and cellulose wood pulp are added to hot water and agitated. The pulpers are exhausted through the following emission points. EP 00005 - No. 1 pulper; EP 00007 - No. 3 pulper; EP 00030 - No. 7 pulper.

Emission unit 1CONVT - This emission unit consists of four converting systems where gasket material is coated or densified.

Emission unit 1CONVT is associated with the following emission points (EP):

00036, 00042, 00043, 00045

It is further defined by the following process(es):

Process: 005 is located at FLOOR 1, Building 49 - Process 005 consists of curing systems to cure and densify gasket material. The converting operations are exhausted through the following emission points: EP 00036 - rotary cure system; EP 00042 - South flat bed press; EP 00043 - North flat bed press; EP 00045 - No. 4 calendar press.

Emission unit 1BOILR - This emission unit consists of two (2) boilers which provide process and heating steam for the facility. Boiler No. 4 is a 112 mmBTU/hr heat input, natural gas fired boiler. Boiler No. 5 is a 156 mmBTU/hr heat input boiler firing No. 6 fuel oil.

Emission unit 1BOILR is associated with the following emission points (EP):

00101, 00102

It is further defined by the following process(es):

Process: 002 is located at 1ST FLOOR, Building 54 - Process 002 consists of boiler No. 4 (112

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mmBTU/hr) burning only natural gas. Emissions are exhausted through EP 00102.
Process: 003 is located at 1ST FLOOR, Building 54 - Process 003 consists of boiler No. 5 (156 mmBTU/hr) burning only No. 6 fuel oil. Emissions are exhausted through EP 00101.

Title V/Major Source Status

INTERFACE SOLUTIONS INC is subject to Title V requirements. This determination is based on the following information:

The facility has potential major emissions of SO₂ and VOC. Emissions of NO_x are capped below the major source threshold. This modification will cap HAP emissions below major source thresholds. The sources of NO_x and SO₂ emissions are the two facility boilers, one burns natural gas and one No. 6 fuel oil. The sources of VOC and HAPs are the two paper machines and the paper coating station.

Program Applicability

The following chart summarizes the applicability of INTERFACE SOLUTIONS INC with regards to the principal air pollution regulatory programs:

Regulatory Program	Applicability
PSD	YES
NSR (non-attainment)	NO
NESHAP (40 CFR Part 61)	NO
NESHAP (MACT - 40 CFR Part 63)	NO
NSPS	NO
TITLE IV	NO
TITLE V	YES
TITLE VI	NO
RACT	NO
SIP	YES

NOTES:

PSD Prevention of Significant Deterioration (40 CFR 52) - requirements which pertain to major stationary sources located in areas which are in attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

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NSR New Source Review (6 NYCRR Part 231) - requirements which pertain to major stationary sources located in areas which are in non-attainment of National Ambient Air Quality Standards (NAAQS) for specified pollutants.

NESHAP National Emission Standards for Hazardous Air Pollutants (40 CFR 61) - contaminant and source specific emission standards established prior to the Clean Air Act Amendments of 1990 (CAAA) which were developed for 9 air contaminants (inorganic arsenic, radon, benzene, vinyl chloride, asbestos, mercury, beryllium, radionuclides, and volatile HAP's)

MACT Maximum Achievable Control Technology (40 CFR 63) - contaminant and source specific emission standards established by the 1990 CAAA. Under Section 112 of the CAAA, the US EPA is required to develop and promulgate emissions standards for new and existing sources. The standards are to be based on the best demonstrated control technology and practices in the regulated industry, otherwise known as MACT. The corresponding regulations apply to specific source types and contaminants.

NSPS New Source Performance Standards (40 CFR 60) - standards of performance for specific stationary source categories developed by the US EPA under Section 111 of the CAAA. The standards apply only to those stationary sources which have been constructed or modified after the regulations have been proposed by publication in the Federal Register and only to the specific contaminant(s) listed in the regulation.

Title IV Acid Rain Control Program (40 CFR 72 thru 78) - regulations which mandate the implementation of the acid rain control program for large stationary combustion facilities.

Title VI Stratospheric Ozone Protection (40 CFR 82, Subparts A thru G) - federal requirements that apply to sources which use a minimum quantity of CFC's (chlorofluorocarbons), HCFC's (hydrofluorocarbons) or other ozone depleting substances or regulated substitute substances in equipment such as air conditioners, refrigeration equipment or motor vehicle air conditioners or appliances.

RACT Reasonably Available Control Technology (6 NYCRR Parts 212.10, 226, 227-2, 228, 229, 230, 232, 233, 234, 235, 236) - the lowest emission limit that a specific source is capable of meeting by application of control technology that is reasonably available, considering technological and economic feasibility. RACT is a control strategy used to limit emissions of VOC's and NOx for the purpose of attaining the air quality standard for ozone. The term as it is used in the above table refers to those state air pollution control regulations which specifically regulate VOC and NOx emissions.

SIP State Implementation Plan (40 CFR 52, Subpart HH) - as per the CAAA, all states are empowered and required to devise the specific combination of controls that, when implemented, will bring about attainment of ambient air quality standards established by the federal government and the individual state. This specific combination of measures is referred to as the SIP. The term here refers to those state regulations that are approved to be included in the SIP and thus are considered federally enforceable.

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Compliance Status

Facility is in compliance with all requirements

SIC Codes

SIC or Standard Industrial Classification code is an industrial code developed by the federal Office of Management and Budget for use, among other things, in the classification of establishments by the type of activity in which they are engaged. Each operating establishment is assigned an industry code on the basis of its primary activity, which is determined by its principal product or group of products produced or distributed, or services rendered. Larger facilities typically have more than one SIC code.

SIC Code	Description
2621	PAPER MILLS EXC BUILDING PAPER

SCC Codes

SCC or Source Classification Code is a code developed and used by the USEPA to categorize processes which result in air emissions for the purpose of assessing emission factor information. Each SCC represents a unique process or function within a source category logically associated with a point of air pollution emissions. Any operation that causes air pollution can be represented by one or more SCC's.

SCC Code	Description
1-02-006-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - NATURAL GAS Over 100 MBtu/Hr
1-02-004-01	EXTERNAL COMBUSTION BOILERS - INDUSTRIAL INDUSTRIAL BOILER - RESIDUAL OIL Grade 6 Oil
3-07-013-99	PULP & PAPER AND WOOD PRODUCTS PULP & PAPER & WOOD - MISCELLANEOUS PAPER PRODUCTS Other Not Classified
4-02-013-01	SURFACE COATING OPERATIONS SURFACE COATING OPERATIONS - PAPER COATING Coating Operation

Facility Emissions Summary

In the following table, the CAS No. or Chemical Abstract Series code is an identifier assigned to every chemical compound. [NOTE: Certain CAS No.'s contain a 'NY' designation within them. These are not true CAS No.'s but rather an identification which has been developed by the department to identify groups of contaminants which ordinary CAS No.'s do not do. As an example, volatile organic compounds or VOC's are identified collectively by the NY CAS No. 0NY998-00-0.] The PTE refers to the Potential to Emit. This is defined as the maximum capacity of a facility or air contaminant source to emit any air contaminant under its physical and operational design. Any physical or operational limitation

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on the capacity of the facility or air contamination source to emit any air contaminant , including air pollution control equipment and/or restrictions on the hours of operation, or on the type or amount or material combusted, stored, or processed, shall be treated as part of the design only if the limitation is contained in federally enforceable permit conditions. The PTE Range represents an emission range for a contaminant. Any PTE quantity that is displayed represents a facility-wide emission cap or limitation for that contaminant. If no PTE quantity is displayed, the PTE Range is provided to indicate the approximate magnitude of facility-wide emissions for the specified contaminant in terms of tons per year (tpy). The term ‘HAP’ refers to any of the hazardous air pollutants listed in section 112(b) of the Clean Air Act Amendments of 1990. Total emissions of all hazardous air pollutants are listed under the special NY CAS No. 0NY100-00-0. In addition, each individual hazardous air pollutant is also listed under its own specific CAS No. and is identified in the list below by the (HAP) designation.

Cas No.	Contaminant Name	PTE	
		lbs/yr	Range
000092-52-4	1, 1 BIPHENYL (HAP)	> 0	but < 10 tpy
000079-34-5	1,1,2,2-TETRACHLOROETHANE (HAP)	> 0	but < 10 tpy
000106-99-0	1,3-BUTADIENE (HAP)	> 0	but < 10 tpy
000542-75-6	1-PROPENE, 1,3-DICHLORO- (HAP)	> 0	but < 10 tpy
000141-32-2	2-PROPENOIC ACID, BUTYL ESTER C7H12O2	> 0	but < 2.5 tpy
000075-07-0	ACETALDEHYDE (HAP)	> 0	but < 10 tpy
000107-02-8	ACROLEIN (HAP)	> 0	but < 10 tpy
007664-41-7	AMMONIA	>= 40	tpy but < 50 tpy
007440-38-2	ARSENIC (HAP)	> 0	but < 10 tpy
000071-43-2	BENZENE (HAP)	> 0	but < 10 tpy
000106-46-7	BENZENE, 1,4-DICHLORO- (HAP)	> 0	but < 10 tpy
007440-41-7	BERYLLIUM (HAP)	> 0	but < 10 tpy
007440-43-9	CADMIUM (HAP)	> 0	but < 10 tpy
000630-08-0	CARBON MONOXIDE	>= 50	tpy but < 100 tpy
000056-23-5	CARBON TETRACHLORIDE (HAP)	> 0	but < 10 tpy
000108-90-7	CHLOROBENZENE (HAP)	> 0	but < 10 tpy
000067-66-3	CHLOROFORM (HAP)	> 0	but < 10 tpy
007440-47-3	CHROMIUM (HAP)	> 0	but < 10 tpy
007440-48-4	COBALT (HAP)	> 0	but < 10 tpy
000071-55-6	ETHANE, 1,1,1-TRICHLORO (HAP)	> 0	but < 10 tpy
000079-00-5	ETHANE, 1,1,2-TRICHLORO (HAP)	> 0	but < 10 tpy
000106-93-4	ETHANE, 1,2-DIBROMO (HAP)	> 0	but < 10 tpy
000100-41-4	ETHYLBENZENE (HAP)	> 0	but < 10 tpy
000050-00-0	FORMALDEHYDE (HAP)	19800	
0NY100-00-0	HAP	49800	
000110-54-3	HEXANE (HAP)	> 0	but < 10 tpy
007439-92-1	LEAD (HAP)	> 0	but < 10 tpy
007439-96-5	MANGANESE (HAP)	> 0	but < 10 tpy
007439-97-6	MERCURY (HAP)	> 0	but < 10 tpy
000080-62-6	METHYL ACRYLIC ACIDMETHYL ESTER (HAP)	> 0	but < 10 tpy
000067-56-1	METHYL ALCOHOL (HAP)	> 0	but < 10 tpy
000074-87-3	METHYL CHLORIDE (HAP)	> 0	but < 10 tpy
000091-20-3	NAPHTHALENE (HAP)	> 0	but < 10 tpy
007440-02-0	NICKEL METAL AND INSOLUBLE COMPOUNDS (HAP)	> 0	but < 10 tpy
0NY210-00-0	OXIDES OF NITROGEN	198800	
000106-89-8	OXIRANE, (CHLOROMETHYL) (HAP)	> 0	but < 10 tpy
0NY075-00-0	PARTICULATES	>= 250	tpy
000540-84-1	PENTANE, 2,2,4-TRIMETHYL- (HAP)	> 0	but < 10 tpy
000108-95-2	PHENOL (HAP)	> 0	but < 10 tpy



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0NY075-00-5	PM-10	>= 250 tpy
130498-29-2	POLYCYCLIC AROMATIC HYDROCARBONS (HAP)	> 0 but < 10 tpy
000107-13-1	PROPENENITRILE (HAP)	> 0 but < 10 tpy
007782-49-2	SELENIUM (HAP)	> 0 but < 10 tpy
000100-42-5	STYRENE (HAP)	19800
007446-09-5	SULFUR DIOXIDE	>= 250 tpy
007664-93-9	SULFURIC ACID	>= 40 tpy but < 50 tpy
000108-88-3	TOLUENE (HAP)	> 0 but < 10 tpy
000075-01-4	VINYL CHLORIDE (HAP)	> 0 but < 10 tpy
0NY998-00-0	VOC	>= 50 tpy but < 100 tpy
001330-20-7	XYLENE, M, O & P MIXT. (HAP)	> 0 but < 10 tpy

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: Emergency Defense - 6NYCRR Part 201-1.5

An emergency constitutes an affirmative defense to an action brought for noncompliance with emissions limitations or permit conditions for all facilities in New York State.

(a) The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- (1) An emergency occurred and that the facility owner and/or operator can identify the cause(s) of the emergency;
- (2) The equipment at the permitted facility causing the emergency was at the time being properly operated;
- (3) During the period of the emergency the facility owner and/or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- (4) The facility owner and/or operator notified the Department within two working days after the event occurred. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

(b) In any enforcement proceeding, the facility owner and/or operator seeking to establish the occurrence of an emergency has the burden of proof.

(c) This provision is in addition to any emergency or upset provision contained in any applicable requirement.

Item B: Public Access to Recordkeeping for Title V Facilities - 6NYCRR Part 201-1.10(b)

The Department will make available to the public any permit application, compliance plan, permit, and monitoring and compliance certification report pursuant to Section 503(e) of the Act, except for

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information entitled to confidential treatment pursuant to 6NYCRR Part 616 - Public Access to records and Section 114(c) of the Act.

Item C: Timely Application for the Renewal of Title V Permits - 6 NYCRR Part 201-6.3(a)(4)

Owners and/or operators of facilities having an issued Title V permit shall submit a complete application at least 180 days, but not more than eighteen months, prior to the date of permit expiration for permit renewal purposes.

Item D: Certification by a Responsible Official - 6 NYCRR Part 201-6.3(d)(12)

Any application, form, report or compliance certification required to be submitted pursuant to the federally enforceable portions of this permit shall contain a certification of truth, accuracy and completeness by a responsible official. This certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Item E: Requirement to Comply With All Conditions - 6 NYCRR Part 201-6.5(a)(2)

The permittee must comply with all conditions of the Title V facility permit. Any permit non-compliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

Item F: Permit Revocation, Modification, Reopening, Reissuance or Termination, and Associated Information Submission Requirements - 6 NYCRR Part 201-6.5(a)(3)

This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Item G: Cessation or Reduction of Permitted Activity Not a Defense - 6NYCRR Part 201-6.5(a)(5)

It shall not be a defense for a permittee in an enforcement action to claim that a cessation or reduction in the permitted activity would have been necessary in order to maintain compliance with the conditions of this permit.

Item H: Property Rights - 6 NYCRR Part 201-6.5(a)(6)

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This permit does not convey any property rights of any sort or any exclusive privilege.

Item I: Severability - 6 NYCRR Part 201-6.5(a)(9)

If any provisions, parts or conditions of this permit are found to be invalid or are the subject of a challenge, the remainder of this permit shall continue to be valid.

Item J: Permit Shield - 6 NYCRR Part 201-6.5(g)

All permittees granted a Title V facility permit shall be covered under the protection of a permit shield, except as provided under 6 NYCRR Subpart 201-6. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in the permit, or the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the major stationary source, and the permit includes the determination or a concise summary thereof. Nothing herein shall preclude the Department from revising or revoking the permit pursuant to 6 NYCRR Part 621 or from exercising its summary abatement authority. Nothing in this permit shall alter or affect the following:

- i. The ability of the Department to seek to bring suit on behalf of the State of New York, or the Administrator to seek to bring suit on behalf of the United States, to immediately restrain any person causing or contributing to pollution presenting an imminent and substantial endangerment to public health, welfare or the environment to stop the emission of air pollutants causing or contributing to such pollution;
- ii. The liability of a permittee of the Title V facility for any violation of applicable requirements prior to or at the time of permit issuance;
- iii. The applicable requirements of Title IV of the Act;
- iv. The ability of the Department or the Administrator to obtain information from the permittee concerning the ability to enter, inspect and monitor the facility.

Item K: Reopening for Cause - 6 NYCRR Part 201-6.5(i)

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This Title V permit shall be reopened and revised under any of the following circumstances:

- i. If additional applicable requirements under the Act become applicable where this permit's remaining term is three or more years, a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the original permit or any of its terms and conditions has been extended by the Department pursuant to the provisions of Part 201-6.7 and Part 621.
- ii. The Department or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
- iii. The Department or the Administrator determines that the Title V permit must be revised or reopened to assure compliance with applicable requirements.
- iv. If the permitted facility is an "affected source" subject to the requirements of Title IV of the Act, and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit.

Proceedings to reopen and issue Title V facility permits shall follow the same procedures as apply to initial permit issuance but shall affect only those parts of the permit for which cause to reopen exists.

Reopenings shall not be initiated before a notice of such intent is provided to the facility by the Department at least thirty days in advance of the date that the permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency.

Item L:

Permit Exclusion - ECL 19-0305

The issuance of this permit by the Department and the receipt thereof by the Applicant does not and shall not be construed as barring, diminishing, adjudicating or in any way affecting any legal, administrative or equitable rights or claims, actions, suits, causes of action or demands whatsoever that the Department may have against the Applicant for violations based on facts and circumstances alleged to have occurred or existed prior to the effective date of this

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permit, including, but not limited to, any enforcement action authorized pursuant to the provisions of applicable federal law, the Environmental Conservation Law of the State of New York (ECL) and Chapter III of the Official Compilation of the Codes, Rules and Regulations of the State of New York (NYCRR). The issuance of this permit also shall not in any way affect pending or future enforcement actions under the Clean Air Act brought by the United States or any person.

Item M: Federally Enforceable Requirements - 40 CFR 70.6(b)

All terms and conditions in this permit required by the Act or any applicable requirement, including any provisions designed to limit a facility's potential to emit, are enforceable by the Administrator and citizens under the Act. The Department has, in this permit, specifically designated any terms and conditions that are not required under the Act or under any of its applicable requirements as being enforceable under only state regulations.

NOTIFICATION OF GENERAL PERMITTEE OBLIGATIONS

Item A: General Provisions for State Enforceable Permit Terms and Condition - 6 NYCRR Part 201-5

Any person who owns and/or operates stationary sources shall operate and maintain all emission units and any required emission control devices in compliance with all applicable Parts of this Chapter and existing laws, and shall operate the facility in accordance with all criteria, emission limits, terms, conditions, and standards in this permit. Failure of such person to properly operate and maintain the effectiveness of such emission units and emission control devices may be sufficient reason for the Department to revoke or deny a permit.

The owner or operator of the permitted facility must maintain all required records on-site for a period of five years and make them available to representatives of the Department upon request. Department representatives must be granted access to any facility regulated by this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations or law.

Regulatory Analysis

Condition

Facility/EU/EP/Process/ES

FACILITY

ECL 19-0301

Powers and Duties of the 1-30

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Nonattainment Areas and 1-29
Ozone Transport Region

Applicability Discussion:

Mandatory Requirements: The following facility-wide regulations are included in all Title V permits:

ECL 19-301.

This section of the Environmental Conservation Law establishes the powers and duties assigned to the Department with regard to administering the air pollution control program for New York State.

6NYCRR Part 200-.5

Allows for the sealing of non-compliant air contamination sources

6NYCRR Part 200-.6

Acceptable ambient air quality - prohibits contravention of ambient air quality standards without mitigating measures

6NYCRR Part 200-.7

Anyone owning or operating an air contamination source which is equipped with an emission control device must operate the control consistent with ordinary and necessary practices, standards and procedures, as per manufacturer's specifications and keep it in a satisfactory state of maintenance and repair so that it operates effectively

6NYCRR Part 201-1.2

Any existing emission source that is required to be permitted or registered but has not done so, must apply for the necessary permit or registration. The source is subject to all regulations that were applicable at the time the original permit or registration was required as well as any subsequent applicable requirements that came into effect since.

6NYCRR Part 201-1.4

This regulation specifies the actions and recordkeeping and reporting requirements for any violation of an applicable state enforceable emission standard that results from a necessary scheduled equipment maintenance, start-up, shutdown, malfunction or upset in the event that these are unavoidable.

6NYCRR Part 201-1.7

Requires the recycle and salvage of collected air contaminants where practical

6NYCRR Part 201-1.8

Prohibits the reintroduction of collected air contaminants to the outside air

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6NYCRR Part 201-3.2(a)

An owner and/or operator of an exempt emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains exempt emission sources or units, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-3.3(a)

The owner and/or operator of a trivial emission source or unit may be required to certify that it operates within the specific criteria described in this Subpart. All required records must be maintained on-site for a period of 5 years and made available to department representatives upon request. In addition, department representatives must be granted access to any facility which contains trivial emission sources or units subject to this Subpart, during normal operating hours, for the purpose of determining compliance with this and any other state and federal air pollution control requirements, regulations, or law.

6NYCRR Part 201-5

This regulation applies to those permit terms and conditions which are not federally enforceable. It specifies the applicability criteria for state facility permits, the information to be included in all state facility permit applications as well as the permit content, terms of permit issuance, and sets guidelines for modifying state facility permits and allowing for operational flexibility. For permitting purposes, this rule specifies the need to list all emission units except those that are exempt or trivial pursuant to Subpart 201-3 in the permit application and provide a description of the emission unit's processes and products. Finally, this rule also provides the Department the authority to include this and any other information that it deems necessary to identify applicable Federal standards, recordkeeping and reporting requirements, and establish terms and conditions that will ensure compliance with the national ambient air quality standards.

6NYCRR Part 201-5.3(b)

Lists those contaminants subject to contaminant specific requirements

6NYCRR Part 201-6

This regulation applies to those terms and conditions which are subject to Title V permitting. It establishes the applicability criteria for Title V permits, the information to be included in all Title V permit applications as well as the permit content and terms of permit issuance. This rule also specifies the compliance, monitoring, recordkeeping, reporting, fee, and procedural requirements that need to

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be met to obtain a Title V permit, modify the permit and demonstrate conformity with applicable requirements as listed in the Title V permit. For permitting purposes, this rule specifies the need to identify and describe all emission units, processes and products in the permit application as well as providing the Department the authority to include this and any other information that it deems necessary to determine the compliance status of the facility.

6NYCRR 201-6.5(a)(4)

This mandatory requirement applies to all Title V facilities. It requires the permittee to provide information that the Department may request in writing, within a reasonable time, in order to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. The request may include copies of records required to be kept by the permit.

6NYCRR 201-6.5(a)(7)

This is a mandatory condition that requires the owner or operator of a facility subject to Title V requirements to pay all applicable fees associated with the emissions from their facility.

6NYCRR 201-6.5(a)(8)

This is a mandatory condition for all facilities subject to Title V requirements. It allows the Department to inspect the facility to determine compliance with this permit, including copying records, sampling and monitoring, as necessary.

6NYCRR Part 201-6.5(c)

This requirement specifies, in general terms, what information must be contained in any required compliance monitoring records and reports. This includes the date, time and place of any sampling, measurements and analyses; who performed the analyses; analytical techniques and methods used as well as any required QA/QC procedures; results of the analyses; the operating conditions at the time of sampling or measurement and the identification of any permit deviations. All such reports must also be certified by the designated responsible official of the facility.

6NYCRR Part 201-6.5(c)(2)

This requirement specifies that all compliance monitoring and recordkeeping is to be conducted according to the terms and conditions of the permit and follow all QA requirements found in applicable regulations. It also requires monitoring records and supporting information to be retained for at least 5 years from the time of sampling, measurement, report or application. Support information is defined as including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

6NYCRR Part 201-6.5(c)(3)

This regulation specifies that the permit incorporate all reporting requirements associated with an applicable federal rule, the submittal of any required monitoring

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reports at least every 6 months, and the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR Part 201-6.5(c)(3)(ii)

This regulation specifies any reporting requirements incorporated into the permit must include provisions regarding the notification and reporting of permit deviations and incidences of noncompliance stating the probable cause of such deviations, and any corrective actions or preventive measures taken.

6NYCRR 201-6.5(d)(5)

This condition applies to every Title V facility subject to a compliance schedule. It requires that reports, detailing the status of progress on achieving compliance with emission standards, be submitted semiannually.

6NYCRR Part 201-6.5(e)

Sets forth the general requirements for compliance certification content; specifies an annual submittal frequency; and identifies the EPA and appropriate regional office address where the reports are to be sent.

6NYCRR 201-6.5(f)(6)

This condition allows changes to be made at the facility, without modifying the permit, provided the changes do not cause an emission limit contained in this permit to be exceeded. The owner or operator of the facility must notify the Department of the change. It is applicable to all Title V permits which may be subject to an off permit change.

6NYCRR Part 201-6.5(g)

Permit Exclusion Provisions - specifies those actions, such as administrative orders, suits, claims for natural resource damages, etc that are not affected by the federally enforceable portion of the permit, unless they are specifically addressed by it.

6NYCRR Part 202-1.1

This regulation allows the department the discretion to require an emission test for the purpose of determining compliance. Furthermore, the cost of the test, including the preparation of the report are to be borne by the owner/operator of the source.

6NYCRR Part 202-2.1

Requires that emission statements shall be submitted on or before April 15th each year for emissions of the previous calendar year.

6NYCRR Part 202-2.5

This rule specifies that each facility required to submit an emission statement must retain a copy of the statement and supporting documentation for at least 5 years and must make the information available to department representatives.

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6NYCRR Part 211-.2

This regulation prohibits any emissions of air contaminants to the outdoor atmosphere which may be detrimental to human, plant or animal life or to property, or which unreasonably interferes with the comfortable enjoyment of life or property regardless of the existence of any specific air quality standard or emission limit.

6 NYCRR Part 211.3

This condition requires that the opacity (i.e., the degree to which emissions other than water reduce the transmission of light) of the emissions from any air contamination source be less than 20 percent (six minute average) except for one continuous six-minute period per hour of not more than 57 percent.

6 NYCRR Part 215

Prohibits open fires at industrial and commercial sites.

40 CFR Part 68.

This Part lists the regulated substances and their applicability thresholds and sets the requirements for stationary sources concerning the prevention of accidental releases of these substances.

40 CFR Part 82, Subpart F

Subpart F requires the reduction of emissions of class I and class II refrigerants to the lowest achievable level during the service, maintenance, repair, and disposal of appliances in accordance with section 608 of the Clean Air Act Amendments of 1990. This subpart applies to any person servicing, maintaining, or repairing appliances except for motor vehicle air conditioners. It also applies to persons disposing of appliances, including motor vehicle air conditioners, refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment. Those individuals, operations, or activities affected by this rule, may be required to comply with specified disposal, recycling, or recovery practices, leak repair practices, recordkeeping and/or technician certification requirements.

Facility Specific Requirements

In addition to Title V, INTERFACE SOLUTIONS INC has been determined to be subject to the following regulations:

40CFR 52-HH

This section of the Code of Federal Regulations lists the New York State air regulations that have been approved by EPA in the State Implementation Plan.

40CFR 63-DDDDD

This subpart contains standards for major HAP emitting facilities that operate industrial, commercial, and

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institutional boilers and process heaters.

40CFR 63-JJJJ

This subpart contains standards for major HAP emitting facilities that coat paper webs and other webs.

40CFR 63-ZZZZ

This subpart contains standards for major HAP emitting facilities that have reciprocating internal combustion engines (RICE).

6NYCRR 201-6.5 (f) (2)

This regulation defines, in general terms, the protocol component of the operational flexibility provisions. Protocols are to specify how proposed compliance changes are to be evaluated with respect to applicable requirements and in particular Part 212. This regulation requires the protocol to include provisions for notifying the Department of changes, assessing control requirements, determining compliance with applicable rules and maintaining the source inventory.

6NYCRR 201-7

Part 201-7 specifies the criteria that need to be met in order to restrict emissions to avoid Title V or other applicable requirements using federally enforceable permit conditions in a state facility permit.

6NYCRR 212 .10

The requirements of this section apply to general process sources of VOC emissions.

6NYCRR 212 .3 (b)

This rule requires existing sources (in operation on or before July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.15 grains per dry standard cubic foot.

6NYCRR 212 .4 (c)

This rule requires existing sources (in operation after July 1, 1973) of solid particulates with environmental rating of B or C which are not subject to Table 5 "Processes for which Permissible Emission Rate is Based on Process Weight, to be limited to a particulate emission rate not to exceed 0.05 grains per dry standard cubic foot.

6NYCRR 212 .6 (a)

This rule specifies an opacity limitation of less than 20% for any six consecutive minute period for all process emission sources.

6NYCRR 212 .9 (b)

This section refers to Table 2 which specifies the degree of control required for Gases and Liquid Particulate Emissions (Environmental Rating of A, B, C or D) and Solid Particulate Emissions (Environmental Rating A or D) but excluding Volatile Organic Compound Emissions in the New York City Metropolitan Area.

6NYCRR 225-1.2 (a) (2)

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This regulation prohibits any person from selling, offering for sale, purchasing or using any fuel which contains sulfur in a quantity exceeding the limitations set forth in Table 1, Table 2, or Table 3 of this section.

6NYCRR 225-1.8 (a)

Upon request the owner or operator of a facility which purchases and fires coal or oil shall submit reports to the commissioner containing a fuel analysis, information on the quantity of the fuel received, burned, and results of any stack sampling, stack monitoring and any other procedures to ensure compliance with the provisions of 6 NYCRR Part 225-1. All records shall be available for a minimum of three years

6NYCRR 225-1.8 (d)

This requires that sampling, compositing and analysis of fuel samples must be done in accordance with methods acceptable to the commissioner.

6NYCRR 227-1.2 (a) (2)

This rule limits particulate emissions to 0.20 pound per million Btu heat input from any stationary combustion installation with a maximum heat input capacity exceeding 50 million Btu per hour but no greater than 250 million Btu per hour using oil (other than distillate oil), coal tar, or any liquid fuel derived from coal.

6NYCRR 227-1.3

This regulation requires a limitation and compliance monitoring for opacity from a stationary combustion installation.

6NYCRR 227-1.7 (a)

This regulation requires any stationary combustion installation described in section 6 NYCRR 227-1.2 of this Part, to provide pertinent emissions data upon request by the Department..

6NYCRR 227-2

This regulation limits the emission of oxides of nitrogen (NOx) from stationary combustion installations (boilers, combustion turbines and internal combustion engines).

6NYCRR 228 .10

The requirements for handling, storage, and disposal of VOCs are provided in this section.

6NYCRR 228 .2

This reference provides definitions for the important terms used in this rule.

6NYCRR 228 .3 (a)

This reference provides the three options that can be used to control VOC emissions from a surface coating process. The three options are to use a compliant coating (i.e., one that does not exceed the allowable VOC content), the use of a coating system, or the use of air pollution control equipment.

6NYCRR 228 .3 (d) (7)

The use of any noncompliant coating, used in a coating system, must be reported to the Department within 30 days.



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6NYCRR 228.4

This reference requires the opacity of the emissions from a facility, with surface coating processes subject to this rule, to be less than 20 % during any consecutive six minute period. Opacity limits are used primarily to control the quantity of particulates released from a source.

6NYCRR 228.5 (a)

This reference provides the recordkeeping requirements for emission sources subject to this rule. All of these records must be kept for at least five years and provided to the Department upon request.

6NYCRR 228.6 (a)

This reference prohibits a person from selling, specifying, or requiring the use of any coating at a facility, with a coating line described in Table 1 or 2, if the use of the coating is prohibited by any provision in this rule. However, this prohibition does not apply to coating lines with control equipment capable of meeting the allowable VOC emission limits, a compliant coating system, or a coating line which has been granted a variance.

6NYCRR 228.7

Table 1 provides a list of surface coating processes and the corresponding allowable VOC content of the coatings used in each process.

6NYCRR 231-2

The provisions of Subpart 231-2 apply to new or modified major facilities. The contaminants of concern state-wide are nitrogen oxides and volatile organic compounds since New York State is located in the ozone transport region and because there are ozone non-attainment areas within the state. In the New York City metropolitan area, carbon monoxide is also a non-attainment contaminant. In addition, particulate matter less than 10 microns in size (PM-10) is a non-attainment contaminant in Manhattan County.

Compliance Certification

Summary of monitoring activities at INTERFACE SOLUTIONS INC:

Location Facility/EU/EP/Process/ES	Type of Monitoring	Cond No.
1-BOILR/-/003/BOIL5	intermittent emission testing	46
FACILITY	record keeping/maintenance procedures	26
FACILITY	record keeping/maintenance procedures	1-2
FACILITY	record keeping/maintenance procedures	25
1-PAPER/-/006	record keeping/maintenance procedures	1-27
1-PAPER/-/006	record keeping/maintenance procedures	54
FACILITY	monitoring of process or control device parameters as surrogate	1-21
FACILITY	record keeping/maintenance procedures	1-22
FACILITY	monitoring of process or control device parameters as surrogate	1-23
FACILITY	monitoring of process or control device parameters as surrogate	1-24
FACILITY	monitoring of process or control device parameters as surrogate	1-25
1-PAPER/-/006	monitoring of process or control device	1-28



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1-PAPER/-/006	parameters as surrogate	
FACILITY	record keeping/maintenance procedures	1-29
1-PAPER/-/PM1	record keeping/maintenance procedures	30
1-PAPER/-/PM3	intermittent emission testing	66
1-PAPER/-/PM1	intermittent emission testing	68
1-PAPER/-/PM3	intermittent emission testing	65
1-PULPR/00005	intermittent emission testing	67
1-PULPR/00006	intermittent emission testing	71
1-PULPR/00007	intermittent emission testing	72
1-PAPER/00021/007	intermittent emission testing	73
1-PULPR/00020/001	intermittent emission testing	69
1-PULPR/00030/004	intermittent emission testing	74
1-PULPR/00031/001	intermittent emission testing	75
1-CONVT	intermittent emission testing	76
1-PAPER	intermittent emission testing	52
1-PULPR	intermittent emission testing	53
FACILITY	record keeping/maintenance procedures	70
1-PAPER/-/006	record keeping/maintenance procedures	1-32
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FACILITY	work practice involving specific operations	34
FACILITY	work practice involving specific operations	80
1-BOILR/-/003/BOIL5	record keeping/maintenance procedures	35
1-BOILR/00101/003/BOIL5	intermittent emission testing	81
1-BOILR/00101/003/BOIL5	monitoring of process or control device parameters as surrogate	47
1-BOILR/00102/002/BOIL4	record keeping/maintenance procedures	48
1-BOILR/00102/002/BOIL4	monitoring of process or control device parameters as surrogate	50
1-BOILR/-/002/BOIL4	record keeping/maintenance procedures	44
1-BOILR/-/003/BOIL5	record keeping/maintenance procedures	45
1-PAPER/-/006	record keeping/maintenance procedures	56
1-PAPER/-/006	monitoring of process or control device parameters as surrogate	59
1-PAPER/-/006	record keeping/maintenance procedures	60
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Basis for Monitoring

The HAP caps in this modification include monitoring to ensure the facility emissions remain below the major source thresholds on a 12 month rolling basis.